

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

WILLOW INNOVATIONS, INC.,

*Plaintiff,*

v.

CHIARO TECHNOLOGY LTD.

*Defendant.*

Civil Action No. 2:23-cv-00229-JRG

**JURY TRIAL DEMANDED**

**P.R. 4-5 JOINT CLAIM CONSTRUCTION CHART**

Pursuant to Patent Local Rule 4-5(d) and the Court’s Docket Control Order (Dkt. No. 38), Plaintiff Willow Innovations, Inc. (“Willow”) and Defendant Chiaro Technology Ltd. (d/b/a “Elvie”) submit their Joint Claim Construction Chart, attached hereto as Exhibit A.

The claim construction hearing relating to the claims of U.S. Patent Nos. 10,398,816 (the “‘816 Patent”), 10,434,228 (the “‘228 Patent”), 10,625,005 (the “‘005 Patent”), 10,688,229 (the “‘229 Patent”), 10,722,624 (the “‘624 Patent”), 11,185,619 (the “‘619 Patent”), D832,995 (the “‘D995 Patent”), D977,625 (the “‘D625 Patent”), and 11,260,151 (the “‘151 Patent”) is scheduled to occur on **September 24, 2024 at 9:00 a.m.** in Marshall, Texas before this Court.

Dated: September 5, 2024

Respectfully submitted,

/s/ Timothy S. Durst

**O’MELVENY & MYERS LLP**  
Timothy S. Durst (TX #00786924)  
tdurst@omm.com  
Cason Garrett Cole (TX #24109741)  
ccole@omm.com  
2501 North Harwood Street, Suite 1700  
Dallas, TX 75201

Telephone: (972) 360-1900  
Facsimile: (972) 360-1901

Robert F. Shaffer (admitted *pro hac vice*)  
rshaffer@omm.com  
Jason Fountain (admitted *pro hac vice*)  
jfountain@omm.com  
Miao Liu (admitted *pro hac vice*)  
mliu@omm.com  
1625 Eye St., NW  
Washington, DC 20006  
Telephone: (202) 383-5300  
Facsimile: (202) 383-5414

Carolyn S. Wall (admitted *pro hac vice*)  
cwall@omm.com  
1301 Avenue of the Americas  
Suite 1700  
New York, NY 10019-6022  
Telephone: (212) 326-2000  
Facsimile: (212) 326-2061

Laura Burson (TX # 24091995)  
lburson@omm.com  
400 South Hope St  
Los Angeles, CA 90071  
Telephone: (213) 430-6000  
Facsimile: (213) 430-6407

*Attorneys for Plaintiff*  
**WILLOW INNOVATIONS, INC.**

/s/ Nirav N. Desai  
Nirav N. Desai (*pro hac vice*)  
Josephine Kim (*pro hac vice*)  
Alexander Covington (*pro hac vice*)  
Joseph Kim (*pro hac vice*)  
Alex Alfano (*pro hac vice*)  
Michael Webb (*pro hac vice*)  
Paige Cloud (*pro hac vice*)  
Zachary Jacobs (DC Bar # 90005128)  
Christopher Coleman (*pro hac vice*)  
**STERNE, KESSLER, GOLDSTEIN & FOX PLLC**  
1101 K Street NW, 10th Floor

Washington, DC 20005  
Telephone: (202) 371-2600  
Facsimile: (202) 371-2540

Melissa R. Smith  
Texas Bar No. 24001351  
[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)  
**GILLAM & SMITH, LLP**  
303 South Washington Avenue  
Marshall, Texas 75670  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257

*Counsel for Defendant*  
**CHIARO TECHNOLOGY LTD.**

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for Willow met and conferred with counsel for Elvie, and all parties have agreed to the submission of this P.R. 4-5(d) Claim Construction Chart.

/s/ Timothy S. Durst

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on September 5, 2024.

/s/ Timothy S. Durst